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October 18, 2023

**VIA ECF**

Hon. Timothy M. Reif  
 United States Court of International Trade  
 1 Federal Plaza  
 New York, New York 10278

Re: *Ever Victory Technology Limited v. SAS Group, Inc.*  
19-cv-00486 (TMR)

Dear Judge Reif:

Hoffmann & Baron, LLP (“Hoffmann & Baron”) represents defendant SAS Group, Inc. (“SAS”) in the above-referenced action. To prevent possible waiver of attorney-client privilege, avoid public disclosure of client confidences, and minimize potential prejudice to SAS, Hoffmann & Baron respectfully submits this letter-motion requesting that the Court approve for filing under seal with an *ex parte* viewing level designation, Hoffmann & Baron’s memorandum in support of its motion to withdraw as counsel and the Declaration of Daniel A. Scola, Jr. in support of that motion. In connection with its motion to withdraw, Hoffmann & Baron is not asserting a retaining or charging lien.

The reason for Hoffmann & Baron’s request is that it is the preferred practice to file the above-identified pleadings in support of a motion to withdraw as counsel under seal. *See, e.g., Brown v. Montefiore Med. Ctr.*, 19 Civ. 11474 (ALC) (JLC), 2022 U.S. Dist. LEXIS 128965, at \*1 (S.D.N.Y. July 20, 2022); *Team Obsolete Ltd. v. A.H.R.M.A. Ltd.*, 464 F. Supp. 2d 164, 164-65 (E.D.N.Y. 2006).

SAS has indicated that it will not oppose Hoffmann & Baron’s motion to withdraw as counsel.

Counsel for the parties have met and conferred, and plaintiff Ever Victory Technology Limited will not oppose Hoffmann & Baron’s request to seal or its motion to withdraw as counsel.

cc: Counsel of Record (via ECF)

Mr. Scott Sobo: President & CEO, defendant SA Group, Inc. (via

Respectfully,

John T. Gallagher

**GRANTED.** The court grants the letter-motion of Hoffmann & Baron, LLP to file under seal with an *ex parte* viewing level designation Hoffmann & Baron, LLP’s memorandum in support of its motion to withdraw as counsel and the declaration in support of that motion. The Clerk of the Court is respectfully directed to close the open motion at ECF No. 115.

SO ORDERED

DATE October 24, 2023

TIMOTHY M. REIF, JUDGE  
 UNITED STATES COURT OF  
 INTERNATIONAL TRADE  
 SITTING BY DESIGNATION  
 UNITED STATES DISTRICT COURT  
 FOR THE SOUTHERN DISTRICT OF  
 NEW YORK